

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

CONCORD MANAGEMENT AND
CONSULTING LLC,

Defendant.

Crim. No. 18-CR-32-2 (DLF)

FILED UNDER SEAL

**SEALED SUPPLEMENT TO GOVERNMENT'S OPPOSITION TO
DEFENDANT'S MOTION FOR BILL OF PARTICULARS**

The United States of America respectfully submits this sealed supplement to its opposition to the motion of defendant Concord Management and Consulting LLC for a bill of particulars. This sealed supplement describes the content of portions of the sensitive discovery produced to Concord, in support of the government's contention that Concord's motion largely seeks information that "is available in some other form." *United States v. Butler*, 822 F.2d 1191, 1193 (D.C. 1987); *see also United States v. Lorenzana-Cordon*, 130 F. Supp. 3d 172, 179 (D.D.C. 2015) (denying motion for bill of particulars and noting that the government had provided extensive discovery that "allows Defendants to adequately prepare for trial"); *United States v. Brodie*, 326 F. Supp. 2d 83, 91-92 (D.D.C. 2004) (denying motion for bill of particulars based in part on the fact that "the discovery provided by the government has been voluminous").

The sensitive discovery provided to Concord includes

[REDACTED]

[REDACTED] The sensitive discovery also contains a set of "hot documents" that comprises documents from the sensitive discovery production that the government has identified as particularly relevant to the allegations set forth

in the indictment. These portions of the sensitive discovery provide much of the information that Concord seeks in its motion for a bill of particulars.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on March 26, 2019 I caused a copy of the foregoing supplemental filing to be transmitted to Katherine Seikaly and Eric Dubelier, counsel of record for Concord Management and Consulting LLC, via email.

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